

quality of the printing and modifying ink-jet printing parameters." It is to be noted that this quoted subject matter does not appear in currently pending claim 1. Specifically, in the Amendment filed July 15, 2005, this recitation was removed from the claim.

Furthermore, claim 1 was amended to recite that the means for controlling the head to implement ink-jet printing on the card medium operates "in accordance with the geometric and/or positioning parameters provided by said video camera." It is noted that this claimed subject matter is not addressed in the Office Action. For at least this reason, therefore, it is respectfully submitted that the Office Action fails to set forth a prima facie case of obviousness, since it does not identify where each claimed element is disclosed in the cited references.

The McCannel patent is relied upon for its disclosure at column 3, line 67 to column 4, lines 1-5. With reference to Figure 2, this portion of the patent states that a comparator 20 compares printed indicia on the card, and code imparted to magnetic media on the card, relative to electronic data designated for the card. Any discrepancy resulting from this comparison is relayed back to the controller 14, to adjust the data that is fed to the inkjet printer 4 and the encoder 6. The Office Action asserts that an optical vision system can be used to inspect the card, and compare the image with a set of standard or measurement values.

It is respectfully submitted that, even if the referenced portion of the McCannel patent is incorporated into the card printer of the Cummins patent, the resulting combination does not suggest the claimed subject matter. At best, the McCannel patent only discloses that an optical vision system can be used to compare the *indicia* on the card to electronic data that pertains to the card. In other words, a check is made to determine whether the information printed on the card is correct. In contrast, claim 1 recites that the computer-aided vision device measures geometric and/or positioning parameters of the card, and that the inkjet printing on the card is controlled in accordance with these parameters provided by the vision

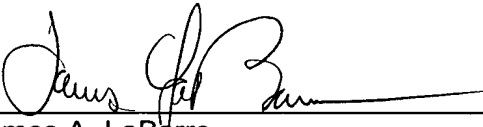
device. The Office Action has not identified any disclosure in the McCannel patent that would lead a person to employ a video camera to measure geometric and/or positioning parameters of card, and to control inkjet printing on the card in accordance with such parameters. Moreover, as pointed out in Applicant's previous response, the Cummins patent teaches away from such a concept, since it employs a tray to hold the cards in precise positions for magnetic encoding and printing operations. Since the position and orientation of the card is predetermined, there is no need to perform dynamic measurement of the geometric and/or positioning parameters of the card.

In summary, therefore, the rejection appears to be based upon the language of claim 1 as it existed prior to the Amendment filed July 15, 2005, and does not address the claim as amended in that response. Since it fails to take into account the subject matter of the pending claim, as a whole, it does not set forth a prima facie case of obviousness. Furthermore, when the subject matter omitted from the Office Action is considered, it can be seen that it is not disclosed in either of the Cummins or McCannel patents. For at least these reasons, withdrawal of the rejection is submitted to be in order. For at least these same reasons, the rejections of claims 2, 8, 10 and 11 should also be withdrawn.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Date: December 30, 2005

By: 
James A. LaBarre
Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620